

1 THE HONORABLE JAMES L. ROBART  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 AUBRY MCMAHON,  
10  
11 Plaintiff,

12 vs.  
13  
14 WORLD VISION, INC.  
15 Defendant.

CASE NO. 2:21-CV-00920-JLR

DECLARATION OF  
MELANIE FREIBERG

16 Melanie Freiberg declares:  
17  
18 1. I have personal knowledge of the facts stated in this Declaration and am  
19 competent to testify to those facts.  
20  
21 2. I am the Senior Director of Talent Management at World Vision, Inc.  
22 ("World Vision" or "WV") and have been so employed since May 29, 2018.  
23  
24 3. As such, I am personally familiar with all documents and media  
25 referenced in this Declaration, all of which were provided to Plaintiff during discovery  
26 and bear a "WV\_\_\_" citation number (or in the few cases of Plaintiff's production, a  
27

1 "P\_\_\_" citation number). I attest to the authenticity and accuracy of these documents  
2 and media at appropriate places throughout this Declaration.

3       4. My responsibilities at World Vision include overseeing two teams:  
4 Talent Acquisition (recruiters) and Human Resource (HR) Business Partners (advisers  
5 to World Vision's internal divisions). I report directly to the Senior Vice President of  
6 HR at World Vision.

7       5. Among other things, I guide and supervise the hiring process for various  
8 divisions at World Vision, including for Donor Contact Services ("DCS"). DCS also can  
9 refer to "Donor/Customer Service," as is typical in our offer letters to DCS job  
10 candidates. As used in this Declaration, "DCSR" means a DCS Representative (or a  
11 "DSRT" while in Training). All these titles refer to the same role and career path at  
12 World Vision.

13       6. When issues surface during the hiring process, those issues generally  
14 escalate to me. So I am familiar with the issues surrounding the rescission of the job  
15 offer to Plaintiff Aubry McMahon in January 2021.

16       7. Ms. McMahon's application process began in late 2020. Attached to this  
17 Declaration as Exhibit MF-01 is a true and correct copy of the Worldvision.org Careers  
18 Page on our web site in effect during that period (WV0045-0047), which includes,  
19 among other things, (a) our expectations of wholehearted agreement with our  
20 Christian faith and (b) our Equal Employment Opportunity statement. Also attached  
21 to this Declaration as Exhibit MF-02 are true and correct copies of documents related  
22 to this application process (P0001-08; P0079).

1       8. On January 5, 2021, World Vision extended to her a written offer of at-  
 2 will employment for the role of “DSR Trainee,” “dependent upon successful  
 3 completion of the training and evaluation program (predicted to be between 9 and 11  
 4 weeks).” Offer Letter (WV0078-0079; P0009-10). Attached to this Declaration as Exhibit  
 5 MF-03 is a true and correct copy of this Offer Letter to Aubry McMahon dated January  
 6 5, 2021 (WV0078-0079; P0009-10).

7       9. Also on January 5, 2021, Ms. McMahon emailed a recruiter whom I  
 8 supervise (Catherine Miolla), noting that Ms. McMahon and her wife were having a  
 9 baby. Attached to this Declaration as Exhibit MF-04 is a true and correct copy of this  
 10 email from Aubry McMahon dated January 5, 2021 (WV0080; P0080-81).

11      10. Catherine properly brought this communication from Ms. McMahon to  
 12 my attention because it indicated potential noncompliance with World Vision’s  
 13 Standards of Conduct and related policies surrounding World Vision’s deeply held  
 14 religious conviction that sexual conduct should not be outside of marriage and that  
 15 marriage is a Biblical covenant between a man and a woman. In World Vision’s view,  
 16 the Biblical covenant of marriage between a man and a woman is the only form of  
 17 marriage approved by God in His Word (the Bible) and thus the only approved place  
 18 for the sexual expression of human love. These Biblical views of marriage and  
 19 sexuality, as held by World Vision, are explained carefully later in this Declaration.

20      11. The January 5, 2021 email from Ms. McMahon conflicted with her  
 21 previous representations that she could and would comply with this standard of  
 22 conduct about marriage and sexual conduct. See DSRT Phone Screening (WV0067-

1 0070). Attached to this Declaration as Exhibit MF-05 is a true and correct copy of this  
2 DSRT Phone Screening (WV0067-0070). Given Ms. McMahon's responses to this Phone  
3 Screening, her January 5, 2021 email indicating a same-sex marriage was unexpected.  
4

5 12. On January 8, 2021, after several attempts by World Vision to discuss this  
6 matter further with Ms. McMahon, World Vision decided to rescind its offer to Ms.  
7 McMahon. Attached to this Declaration as Exhibit MF-06 are true and correct copies  
8 of these emails (WV0081-0082; P0080-81).

9 13. Later that day (January 8, 2021), Ms. McMahon indicated in a phone call  
10 with me and Catherine that she (Ms. McMahon) was in fact in a same-sex marriage but  
11 should not be disqualified for the job. See the contemporaneous Notes of 1/8/2021 call  
12 (WV4697). Attached to this Declaration as Exhibit MF-07 is a true and correct copy of  
13 those Notes (WV4697). I later learned from the materials provided by Ms. McMahon  
14 in this lawsuit that she possessed a recording of a short excerpt from this call. A copy  
15 of this recording as provided by Ms. McMahon is being filed with this Declaration as  
16 Exhibit MF-08.

17 14. In April 2021, Ms. McMahon filed a claim with the EEOC. In July 2021,  
18 Ms. McMahon filed this lawsuit.

19 15. On February 16, 2023, I testified by deposition as a fact witness, as called  
20 by Ms. McMahon. On March 10, 2023, I testified by deposition as the Rule 30(b)(6)  
21 designee on behalf of World Vision.

1       16. In preparation for my 30(b)(6) deposition, I studied and reviewed many  
 2 corporate and organizational materials of World Vision (many of which I was already  
 3 familiar with), including materials that I am authenticating in this Declaration.  
 4

5       17. Following now is a short summary of World Vision and then various  
 6 materials that I will explain and authenticate.

7       18. World Vision was founded in 1950 by Robert Pierce as a Christian  
 8 ministry dedicated to sharing the gospel of Jesus Christ, primarily through  
 9 humanitarian outreach to children and families around the world who are poor and  
 10 underserved. It operates in many ways like a Christian church and implements its  
 11 programs through and as supported by local churches in the United States and around  
 12 the world.

14       19. Under its Articles of Incorporation, “[t]he primary, exclusive and only  
 15 purposes for which this corporation is organized are religious ones, to wit: To perform  
 16 the functions of the Christian church including, without limitation, the following  
 17 functions[:] to conduct Christian religious and missionary services, to disseminate,  
 18 teach and preach the Gospel and teachings of Jesus Christ, to encourage and aid the  
 19 growth, [nurture] and spread of the Christian religion and to render Christian service,  
 20 both material and spiritual to the sick, the aged, the homeless and the needy. The  
 21 recital of these purposes as contained in this paragraph is intended to be exclusive of  
 22 any and all other purposes, this corporation being formed for such religious purposes  
 23 only.” Articles of Incorporation, as Amended, at WV0017-18. See also WV0012  
 24 (paragraph “Second”). Attached to this Declaration as Exhibit MF-09 is a true and  
 25  
 26  
 27

1 correct copy of World Vision's Article of Incorporation, as Amended (WV0001-20).

2 This same "Purpose" provision is included in World Vision's Bylaws.

3       20. The Articles of Incorporation also require World Vision "[t]o continually  
 4 and steadfastly uphold and maintain the following statement of faith of this  
 5 corporation, to wit: (a) We believe the Bible to be the inspired, the only infallible,  
 6 authoritative Word of God; (b) We believe that there is one God, eternally existent in  
 7 three persons: Father, Son, and Holy Spirit; (c) We believe in the deity of our Lord Jesus  
 8 Christ, in His virgin birth, in His sinless life, in His miracles, in His vicarious and  
 9 atoning death through His shed blood, in His bodily resurrection, in His ascension to  
 10 the right hand of the Father, and in His personal return in power and glory; (d) We  
 11 believe that for the salvation of lost and sinful man regeneration by the Holy Spirit is  
 12 absolutely essential; (e) We believe in the present ministry of the Holy Spirit by whose  
 13 indwelling the Christian is enabled to live a godly life; (f) We believe in the resurrection  
 14 of both the saved and the lost; they that are saved unto the resurrection of life and they  
 15 that are lost unto the resurrection of damnation. We believe in the spiritual unity of  
 16 believers in our Lord Jesus Christ." Exhibit MF-09, Articles of Incorporation at 6-7  
 17 (WV0007-0008). See also Articles of Amendment at 2 (WV0013). This Statement of  
 18 Faith is posted to our website (<https://www.worldvision.org/statement-of-faith>) as  
 19 is the Apostles' Creed (<https://www.worldvision.org/the-apostles-creed>).  
 20

21       21. Immediately following the above Statement of Faith is this requirement:  
 22 "That the aforesaid doctrinal statement is the basic Spiritual foundation for this  
 23 corporation, and the same shall not be amended, or deleted from these Articles of  
 24

1 Incorporation except by vote or written consent of all of the members." Exhibit MF-09,  
 2 Articles of Incorporation at 7 (WV0008).

3       22. The above stated religious beliefs of World Vision reflect its ultimate  
 4 foundation as a Christian ministry. Everything else World Vision does or aspires to do  
 5 is built on this foundation. It is the reason and guidance for World Vision's ministry.

6       23. The Job Posting for the position that Ms. McMahon sought at World  
 7 Vision reflects this spiritual foundation. That Job Posting required her to "Personify  
 8 the ministry of World Vision by witnessing to Christ and ministering to others through  
 9 life, deed, word and sign [and k]eep Christ central in our individual and corporate  
 10 lives." Attached to this Declaration as Exhibit MF-10 is a true and correct copy of this  
 11 Job Posting, 2020 (P0011-20; P0072-77; WV0048-0050). Our individual and corporate  
 12 "witness to Jesus Christ" is vital to World Vision, as discussed further below.

13       24. Ms. McMahon brought this lawsuit to dispute World Vision's hiring  
 14 rights. This is not the first time World Vision faced litigation over its hiring rights. In  
 15 *Spencer v. World Vision*, former employees sued World Vision in this same court in  
 16 litigation that lasted from about 2007 to 2011. I have reviewed factual statements about  
 17 World Vision, its Christian beliefs, its policies and requirements for employees, and  
 18 similar factual matters from the court opinions in that litigation to verify whether they  
 19 remain true and accurate statements about World Vision.

20       25. I confirm that the following statements of fact (in this paragraph), taken  
 21 from the court opinions in the *Spencer v. World Vision* litigation, have remained true at  
 22 all times of my World Vision tenure: World Vision's "overt Christianity is especially

1 evident to" job seekers because it permeates the World Vision workplace. It does so  
 2 because World Vision exists "only" to "spread" its "Christian faith" as "infallibl[y]"  
 3 and "authoritative[ly]" established by "the Bible." This faith dwells "at the heart of  
 4 all" World Vision does, including its "relief efforts," which "flow from [its] profound  
 5 sense of religious mission." Since World Vision "believes the key" to this mission "lies  
 6 first in the hearts and minds of [its] staff," its workforce consists "only [of] Christians  
 7 for all positions." From each member of this Christian workforce, World Vision  
 8 requires a "commitment to [this] shared faith [and] a common understanding of how  
 9 that faith is lived out day-to-day."

12       26. I also confirm that the following statements of fact (in this paragraph),  
 13 taken from the court opinions in the *Spencer v. World Vision* litigation, have remained  
 14 true at all times of my World Vision tenure: All World Vision staff (including DCSRs)  
 15 are responsible for: (a) confessing they are committed Christians; (b) agreeing  
 16 "wholeheartedly" with World Vision's core religious principles; (c) "communicating  
 17 [World Vision's] Christian faith [and] witness," which is "integrated [into] everything  
 18 [it] does," "accurately and with integrity"; and (d) participating "regularly" in "prayer  
 19 activities, devotionals, and weekly chapel services." A core job responsibility of all staff  
 20 is prayer, which "is a component of [World Vision's] work." To begin each work year,  
 21 "an entire work day is set aside each year for prayer," which all staff must attend.  
 22

25       27. I further confirm that the statements of fact (in the succeeding  
 26 subparagraphs), taken from the court opinions in the *Spencer v. World Vision* litigation,  
 27 have remained true at all times of my World Vision tenure.

- 1           a. “The primary, exclusive and only purposes for which [World Vision] is  
 2           organized are religious ones, to wit: to perform the functions of the  
 3           Christian church including, without limitation, the following functions[:]  
 4           to conduct Christian religious and missionary services, to disseminate,  
 5           teach and preach the Gospel and teachings of Jesus Christ, to encourage  
 6           and aid the growth, [nurture,] and spread of the Christian religion[,] and  
 7           to render Christian service, both material and spiritual to the sick, the  
 8           aged, the homeless and the needy. [T]his corporation [is] formed for such  
 9           religious purposes only.”
- 10           b. The IRS classified World Vision as a 501(c)(3) tax-exempt nonprofit  
 11           organization designated as a church.
- 12           c. “[P]rospective employees are informed” that ““our faith in Jesus [is] at  
 13           the heart of all we do,”” and ““[f]oundational to our work is the  
 14           commitment to a shared faith by staff [and] a common understanding of  
 15           how that faith is lived out day-to-day.””
- 16           d. “[Most donations come] from churches and individuals ‘who share the  
 17           religious vision of [World Vision].’ Fundraising letters to donors contain  
 18           Bible verses and reference[ its] Christian[ity]. [It] holds itself out to the  
 19           public as a religious organization. Its website, job application form,  
 20           mailings, instruction materials, and business cards all reference [that it  
 21           is] ‘Christian[,]’ that ‘[its] faith [in Jesus] is at the heart of all [it does].’  
 22           [R]eligious art [is] displayed throughout [its] campuses and buildings.

[Work life] regularly includes prayers and other forms of worship such as chapel services, devotionals led by [staff], prayer chains, an annual day of prayer, and Scriptural themes. ['It] coordinates Christian employee programming[' and] prayer is a component of [its] work. [Its] membership is comprised of coreligionists; ['It] hires only Christians for all positions.'"

- e. "Even a cursory review of World Vision's [foundational documents] reveal explicit and overt references to a religious purpose. [This includes] the commitment to 'continually and steadfastly uphold and maintain the following statement of faith,' which begins: 'We believe the Bible to be the inspired, the only infallible, authoritative Word of God.'"
- f. All of World Vision's core "principles are avowedly religious."
- g. "World Vision ['expresses its] Christian faith accurately and with integrity' [and] 'always identifies itself [as] Christian[.]' [E]mployees are to ask themselves, 'Would anyone who read this know that World Vision is a Christian organization?' ['Our witness is] NOT AN ADD-ON. Because we demonstrate our faith through life, deed, word, and sign, our Christian witness is integrated into [and] communicated as part of everything [we do].'"
- h. "This overt Christianity is especially evident to those applying for employment" at World Vision. Its "prospective employees [are]

1 specifically requested to describe their ‘relationship with Jesus Christ’”  
 2 and are “informed that employment is contingent upon” their faithfully  
 3 following Christ.  
 4

- 5 i. “[B]ecause it ‘believes the key to faithfully following Christ lies first in  
 6 the hearts and minds of [its] staff and only then in program activities,’  
 7 religion pervades the workplace at World Vision. New employees  
 8 participate in a [multi]-day orientation which begins with … devotionals  
 9 and ‘focuses on serving Christ as the motivation for serving the poor.’  
 10 [They] are ‘strongly encouraged’ to attend weekly chapel services[;]  
 11 devotional activities are held [several times a week] within each  
 12 department; prayer requests are circulated amongst coworkers; Biblical  
 13 ‘themes’ are emphasized [continually]; and an entire work day is set  
 14 aside each year for prayer.”
- 15 j. World Vision’s “relief efforts flow from a profound sense of religious  
 16 mission [and] it explicitly and intentionally holds itself out to the public  
 17 as [such].”
- 18 k. World Vision’s “services are made available to people of all faiths or of  
 19 no faith.”
- 20 l. World Vision (i) is organized for a religious purpose, (ii) is engaged  
 21 primarily in carrying out that religious purpose, (iii) holds itself out to  
 22 the public as an entity for carrying out that religious purpose, and (iv)

1           does not engage primarily or substantially in the exchange of goods or  
 2           services for money beyond nominal amounts.  
 3

4       28. Additional explanation and authentication of World Vision policies,  
 5 expectations, and employment actions now follow.  
 6

7       29. World Vision's understanding of the infallible, authoritative nature of  
 8 the Bible as God's Word is embodied in the World Vision Faith in Action Study Bible  
 9 (Zondervan 2005) (an illustrated Bible featuring World Vision's work as a response to  
 10 Scripture) ("WV Study Bible"). This 2,315-page WV Study Bible contains many photos  
 11 and marginal study notes with emphasis on topics important to World Vision. A true  
 12 and correct hardbound WV Study Bible is being filed with this Declaration as Exhibit  
 13 MF-11.<sup>1</sup> Attached to this Declaration as Exhibit MF-12 are true and correct copies of  
 14 the front and back cover and sample pages from this WV Study Bible (WV2794-2804).  
 15

16       30. Our Job Postings require "witnessing to Christ and ministering to others  
 17 through life, deed, word and sign." See, for example, Exhibit MF-10, Job Posting, 2020  
 18 (P0011-20; P0072-77; WV0048-0050). For World Vision, its individual and corporate  
 19 "witness" is vital to its existence. "We believe [all our] efforts are a witness to Jesus  
 20 Christ through life, word, sign, and deed, and encourage individuals to respond to the  
 21 gospel." Exhibit MF-11, WV Study Bible at ix.  
 22

23       31. The phrase "witness to Jesus Christ," and doctrines about being a faithful  
 24 witness to, for, and about Jesus Christ, appear throughout World Vision's core  
 25  
 26

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27       <sup>1</sup> Hardbound WV Study Bibles were provided to Ms. McMahon's counsel in 2022, and presumably to  
 this Court during the *Spencer* litigation in 2008.

1 principles and policies. For example, our Mission Statement (WV0023) says our  
 2 mission as a ministry is to "Witness to Jesus Christ by life, deed, word and sign that  
 3 encourages people to respond to the Gospel." Attached to this Declaration as Exhibit  
 4 MF-13 is a true and correct copy of this World Vision Mission Statement (WV0023).  
 5

6       32.     World Vision also has several policies that charge the ministry and all of  
 7 us who carry out that ministry to maintain this Christian commitment and Christian  
 8 witness. The entire Christian Commitment & Witness Policy (WV0027-0030) does this.  
 9 Attached to this Declaration as Exhibit MF-14 is a true and correct copy of this  
 10 Christian Commitment & Witness Policy ("CCW Policy") (WV0027-0030).

12       33.     The Business Ethics and Christian Conduct Policy ("BECC Policy")  
 13 (WV0031-0034) also does this. For example, the BECC Policy explains that "Effective  
 14 Christian witness is first expressed in the conduct of staff and how we love and share  
 15 a common Statement of Faith. WVUS seeks to be an organization that is 'Christian' in  
 16 every sense of the word; therefore, all staff represent WVUS and, more importantly,  
 17 the Gospel of Jesus Christ, in their work as well as in their private lives." Attached to  
 18 this Declaration as Exhibit MF-15 is a true and correct copy of this World Vision  
 19 Business Ethics and Christian Conduct Policy ("BECC Policy") (WV0031-0034).  
 20

22       34.     As part of the regular onboarding and training process for DCSR  
 23 Trainees, World Vision requires that they expressly affirm the World Vision Statement  
 24 of Faith and/or Apostle's Creed, the Business Ethics and Christian Conduct Policy  
 25 ("BECC Policy"), the Christian Commitment and Witness Policy ("CCW Policy"), and  
 26 the World Vision Standards of Conduct ("SOC"). Attached to this Declaration as  
 27

1 Exhibit MF-16 is a true and correct copy of this required affirmation process in effect  
2 in January 2021 (WV6115-6118).

3       35. World Vision's Christian witness is so foundational to our ministry that  
4 we train our staff on living it and communicating it. Just as one example, World  
5 Vision's Christian Witness Messaging presentation urges World Vision's goal that  
6 "Every current and potential donor and partner will clearly understand our mission  
7 to bear witness to Jesus Christ—through life, deed, word, and sign—in ways that  
8 encourage people to respond to the gospel of Jesus Christ." (WV1125) Attached to this  
9 Declaration as Exhibit MF-17 is a true and correct copy of these WV Christian Witness  
10 Messaging materials (WV1124-1141).

11       36. Indeed, as accurately described by the courts in *Spencer*, our Christian  
12 "witness" is "NOT AN ADD-ON," but instead: "Because we demonstrate our faith  
13 through life, deed, word, and sign, our Christian witness is integrated into [and]  
14 communicated as part of everything [we do]."

15       37. Consequently, our corporate and individual behavior witnesses, reflects,  
16 and testifies about what we believe as a ministry and as individual believers. That  
17 behavior either honors our triune God, or it dishonors Him.

18       38. Because World Vision believes this, it seeks to honor God by requiring  
19 all staff to "[f]ollow the living Christ, individually and corporately in faith and  
20 conduct, publicly and privately, in accord with the teaching in His Word (the Bible)." (WV0027)  
21 CCW Policy at 1 (WV0027).

1       39. Thus, World Vision requires that staff “behavior [be] consistent with the  
 2 teachings of Scripture.” BECC Policy, §2.6.6 (WV0032). Behavior that is consistent with  
 3 the teachings of Scripture honors and glorifies God. Behavior that is inconsistent with  
 4 the teachings of Scripture has the opposite effect and requires repentance.  
 5

6       40. Because it is “impossible … to identify every form of behavior that we  
 7 understand the Bible defines as acceptable and unacceptable to God,” World Vision  
 8 provides Standards of Conduct to “clarify expectations and assist candidates  
 9 /employees in deciding whether or not WVUS is the right place for them to serve the  
 10 Lord.” WVUS Standards of Conduct for Employees, 1 (WV0035). Attached to this  
 11 Declaration as Exhibit MF-18 is a true and correct copy of Standards of Conduct for  
 12 Employees (“Standards of Conduct” or “SOC”) (WV0035-0039). The SOC are part of,  
 13 and an attachment to, the BECC Policy, Exhibit MF-15 (WV0032-0034), and are  
 14 included in the BECC Policy as an embedded document (WV0033). The SOC at the  
 15 time of *Spencer* were included in the materials that World Vision provided to the Court.  
 16

17       41. One of the forms of behavior identified by the SOC is sexual conduct.  
 18 World Vision understands *marriage*, which it defines as the “Biblical covenant …  
 19 between a man and a woman,” SOC at 2 (WV0036), as the exclusive space for human  
 20 sexual conduct, i.e., the sexual expression of human love. See Christian Commitment  
 21 & Witness/Standards of Conduct FAQ 1(F) (WV4694). Attached to this Declaration as  
 22 Exhibit MF-19 is a true and correct copy of this “CCW/SOC FAQ” (WV4694-4696).  
 23

24       42. Stated another way, World Vision defines *marriage* as the “Biblical  
 25 covenant … between a man and a woman,” SOC at 2 (WV0036), and in World Vision’s  
 26

1 view, the Bible confines the “express[ion of] sexuality solely within a faithful marriage  
 2 between a man and a woman,” CCW/SOC FAQ 1(F) (WV4694). Thus, World Vision  
 3 seeks to “honor this Biblical model of a monogamous heterosexual marriage.” *Id.* at  
 4 FAQ 3 (WV4695). This Biblical model, based on a covenant ordained by God, is a  
 5 matter of great importance, in World Vision’s view.

7       43. The above understanding or definition of World Vision of the Biblical  
 8 covenant of marriage may be referred to in this Declaration as its “marriage policy.”  
 9

10      44. For World Vision, any sexual conduct outside this “Biblical covenant,”  
 11 such as “being sexually active with someone other than your spouse of the opposite  
 12 sex,” *id.* at FAQ 3 (WV4694), is a sin and, like any other sin, requires “repentance when  
 13 we fail.” CCW Policy, 2.2 (WV0028). World Vision believes that “all have sinned,”  
 14 BECC Policy, 2.2 (WV0031), due to human sin orientation, but that Christians, when  
 15 they sin, must “return” to God “in repentance.” CCW Policy, 2.2 (WV0028). To World  
 16 Vision, same-sex marriage represents “open, ongoing, unrepentant” sexual  
 17 misconduct contrary to its “deeply held belief that marriage is a Biblical covenant  
 18 between a man and a woman.” *Do you hire LGBTQ individuals?* (WV0731). Attached to  
 19 this Declaration as Exhibit MF-20 is a true and correct copy of this *Do You Hire LGBTQ*  
 20 *Individuals?* document (WV0731).

21      45. “People of any sexual orientation can work at World Vision as long as  
 22 they agree with our statement of faith and abide by our conduct policy. [We hire]  
 23 people who live out biblical standards of conduct. We expect all employees, regardless  
 24 of sexual orientation, to live by these standards, outlined in our conduct policy,

1 including remaining celibate outside of marriage. It's our deeply held belief that  
 2 marriage is a Biblical covenant between a man and a woman. This is made clear to  
 3 people applying to work at World Vision. [O]ur stance [reflects] our interpretation of  
 4 Scripture." Exhibit MF-20 (WV0731). This understanding is also reflected in the  
 5 CCW/SOC FAQs 1-3 (WV4694-4695); in the Hiring Practices (WV2849) and Hiring  
 6 Practices: Employment & Sexual Orientation (WV2853); and in the World Vision  
 7 Christian Compatibility document (WV1390). Attached to this Declaration as Exhibit  
 8 MF-21 is a true and correct copy of the Hiring Practices document (WV2849-2851,  
 9 WV2852-2854) and attached to this Declaration as Exhibit MF-22 is a true and correct  
 10 copy of the WV Christian Compatibility Screening/Christian Commitment & SOC  
 11 (WV1389-1394).

12       46. Out of humble obedience to God's Word, World Vision forbids "sexual  
 13 conduct outside the Biblical covenant of marriage between a man and a woman."  
 14 Exhibit MF-18, SOC #3 at p. 2 (WV0036). Board Standing Policy requires: "All staff  
 15 shall be required to agree to and comply with [this] policy. (John 14:15-21; I John 2:3-6  
 16 and 3:4-6; Galatians 5:22-25). Failure to do so may require disciplinary action or  
 17 termination." Board Standing Policy, §3.7.1 (WV0668). Attached to this Declaration as  
 18 Exhibit MF-23 is a true and correct copy of this Board Standing Policy (WV0659-0678).

19       47. This policy embodies World Vision's deeply held belief in the "Biblical  
 20 model of a monogamous heterosexual marriage." Exhibit MF-19, CCW/SOC FAQ 3  
 21 (WV4695). World Vision strives to apply this policy consistently, even-handedly,  
 22

1 lovingly, humbly, and, above all, faithfully to its understanding of the requirements of  
 2 Scripture.

3       48. At World Vision, this Biblical “stance” on marriage, including its  
 4 exclusive role for the expression of human sexuality, reflects “our interpretation of  
 5 Scripture.” Exhibit MF-20 (WV0731). This stance is part of our individual and  
 6 collective “witness to Jesus Christ.” This stance (witness) is integral to what World  
 7 Vision means when we charge our staff to “Personify the ministry of World Vision by  
 8 witnessing to Christ and ministering to others through life, deed, word and sign [and  
 9 k]eep Christ central in our individual and corporate lives.” Exhibit MF-10, Job Posting,  
 10 2020 (P0011-20; P0072-77; WV0048-0050).

13       49. World Vision believes that same-sex marriage contradicts its Biblical  
 14 policy and witness in several ways. First, entering into and living in a same-sex  
 15 marriage defies World Vision’s religious understanding of and policy regarding  
 16 Biblical marriage. Second, living openly in a same-sex marriage embodies an ongoing  
 17 public stance promoting such conduct. Third, a same-sex marriage indicates sexual  
 18 conduct that does not comply with World Vision’s religious beliefs and Standards of  
 19 Conduct for its employees.

22       50. Following Ms. McMahon’s January 5, 2021 email indicating her same-sex  
 23 marriage, Exhibit MF-04 (WV0080; P0080-0081), World Vision engaged in internal  
 24 discussions about the application of its Biblical marriage policy, and the Scriptural  
 25 truths on which it is based, to Ms. McMahon’s situation. I was involved in most of  
 26 these discussions, as were other managers. As Christians trying to be faithful to God

1 and to World Vision, we sought to apply internal religious policies, requirements, and  
2 doctrine correctly and lovingly. The result of these internal deliberations was a  
3 decision to rescind the job offer.  
4

5       51. Our decision to rescind Ms. McMahon's offer consisted of internal  
6 management-level discussions of World Vision's Biblical marriage policy, the  
7 Scriptures and doctrines underlying it (such as SOC, Exhibit MF-18 (WV0035-0039)),  
8 and the Biblically faithful way to apply these religious requirements for all World  
9 Vision employees and for this specific position.  
10

11       52. I regularly attend organization-wide chapel services and am personally  
12 familiar with chapel services led by DCS and DCS team members. In the regular course  
13 of business, HR archives chapels, including those that predate my employment at WV.  
14 I viewed video recordings of the DCS-led chapel services on June 11, 2008, September  
15 1, 2010, January 22, 2013, June 26, 2019, and August 4, 2021. True and correct video  
16 recordings of these five DCS-led organization-wide chapel services are being filed with  
17 this Declaration as Exhibits MF-24, MF-25, MF-26, MF-27, and MF-28.  
18

19       53. World Vision' s key foundational and operational documents reflect its  
20 religious character and purpose. World Vision includes its mission, vision, and core  
21 values in the "Orange Book: Living Out Our Values," an employee guidebook. World  
22 Vision's Mission Statement is "to follow our Lord and Savior Jesus Christ in working  
23 with the poor and oppressed to promote human transformation, seek justice, and bear  
24 witness to the good news of the kingdom of God." Orange Book at 4 (WV0711). This  
25 Orange Book is made available to all World Vision employees during their initial  
26

1 onboarding or training, and remains available to all employees, to help them better  
2 understand, comply with, and carry out World Vision's mission, vision, and core  
3 values. Attached to this Declaration as Exhibit MF-29 is a true and correct copy of this  
4 World Vision Orange Book: Living Out Our Values (WV0708-0730).

54. World Vision trains our staff, including DCSRs, about World Vision's  
7 Christian mission, vision, core values, and statement of faith, and their Scriptural  
8 foundations, through a number of training programs and materials, such as the  
9 Mission Immersion Program. Attached to this Declaration as Exhibit MF-30 are true  
10 and correct copies of some Mission Immersion Program materials (WV6129-6157).

55. Some examples of World Vision's commitment to prayer by its staff,  
including DCSRs, include the following: the real-time invitation to prayer—"How can  
we pray for you?"—on the World Vision Facebook page (WV5244); the *Hope Over Fear*  
prayer chain that World Vision began in 2020 for staff to pray in a focused regular way  
for prayer requests specifically elicited from or requested by donors and others  
through calls from DCSRs (WV3114-3119, 4845, 4931-4934, 6063); the *Keys to a More*  
*Powerful Prayer Life* resources for staff (WV3509-3516); and the *Devotion Guidelines* to  
guide staff in leading and participating in the regular devotions that each World Vision  
department (including DCS) gathers for several times each week (WV2813-2815).  
Attached to this Declaration as Exhibit MF-31 are true and correct copies of these  
prayer-related materials.

56. Some examples of World Vision's Christian spiritual formation of its  
staff include the *Living Out Our Faith at Work* materials that World Vision provides to

1 guide staff in how to live out their faith and be committed to Christian conduct  
2 throughout their lives (WV2829-2830); the *Making a difference-We are World Vision*  
3 devotional materials for staff (WV5258-5263); and the *Vision Conversation* resources for  
4 staff spiritual formation (WV6065-6070). Attached to this Declaration as Exhibit MF-32  
5 are true and correct copies of these spiritual formation and Christian commitment  
6 materials for staff.

7       57. Additional examples of World Vision's Christian spiritual formation of  
8 its staff include the *Believe Belong Become* program and resources to create a thriving,  
9 Christ-centered employee experience that reinvigorates its employees to be committed  
10 to World Vision's Christ-centered mission and to fulfilling it with the donors and  
11 children World Vision serves, to witness to Christ, to belong to World Vision's diverse  
12 community of Christian believers, and to fulfill World Vision's mission. Attached to  
13 this Declaration as Exhibit MF-33 are true and correct copies of these *Believe Belong*  
14 *Become* materials (WV6016-6044).

15       58. Additional examples of World Vision's Christian spiritual formation of  
16 its staff include the *Witness to Jesus Christ Council* (or "W2JCC") resources to support  
17 their spiritual nurture. Attached to this Declaration as Exhibit MF-34 are true and  
18 correct copies of these *Witness to Jesus Christ Council* materials (WV6077-6086).

19       59. The deep Christian commitment of World Vision and its staff is also  
20 evident in the many forms of Christian religious artwork displayed throughout World  
21 Vision's offices, as the court noted in the *Spencer* case. Attached to this Declaration as  
22

Exhibit MF-35 are true and correct copies of some of this religious artwork (WV3120-3162).

60. A short list of examples of religious programming and training at World Vision includes: (a) New Employee Orientation: Living Out Our Faith @ Work; (b) Faith At Work (Faith@Work) program; (c) Mission Immersion Program; (d) Management Essentials Training (“MET”): Spiritual Leadership & Spiritual Nurture of Staff; (e) MET1: Becoming a Spiritual Leadership; (f) MET2: Spiritually Leading your Teams; (g) Witness to Jesus Christ Council; (h) Believe Belong Become; (i) Annual Day of Prayer; (j) Prayer Masters: Learning to Pray; (k) Hope Over Fear Prayer Chain; (l) Weekly Chapel (organization-wide); (m) Devotions (department-wide, several times per week); and (n) How To Lead a Devotion.

61. World Vision does not charge beneficiaries for any of its goods or services.

\*\*\*\*\* Signature Page Follows \*\*\*\*\*

1 I declare under penalty of perjury under the laws of the State of Washington  
2 that the foregoing is true and correct.  
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5 SIGNED this 10 day of April, 2023, at Auburn, Washington.  
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9 MELANIE FREIBERG  
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